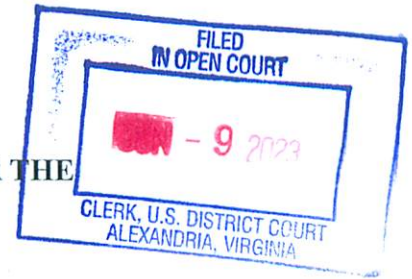


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

BRIANNA ANTHERA JORDANE MILLS,

*Defendant.*

Case No. 1:23-cr-40-CMH

**STATEMENT OF FACTS**

The United States and the defendant, BRIANNA ANTHERA JORDANE MILLS, stipulate that the allegations in Count One of the Superseding Criminal Information and the following facts are true and correct. The parties further stipulate that had the matter gone to trial, the United States would have proven the allegations in the Superseding Criminal Information and the following facts beyond a reasonable doubt.

**I. Introduction**

1. Bank-1 operated in the Washington, D.C. metropolitan area, including in the Eastern District of Virginia. Bank-1 is a financial institution within the meaning of Title 18, United States Code, Section 20.

**II. Criminal Conduct**

2. From at least in or around December 2015 to at least in or around January 2020, within the Eastern District of Virginia and elsewhere, MILLS did knowingly and intentionally conspire with Stanley Desirade, Terrell Hale, others, both known and unknown, to transfer, possess, and use, without lawful authority, the means of identification of another person—namely, names, social security numbers, dates of birth, and address—knowing that the means of

identification belonged to another actual person, with the intent to commit, and to aid or abet, and in connection with, any unlawful activity that constitutes a violation of Federal law—namely, bank fraud in violation of 18 U.S.C. § 1344—and the offense involved the transfer of a false identification document.

3. More specifically, MILLS participated in a scheme where she obtained customer account information and used that customer account information to conduct fraudulent counter withdrawals.

4. MILLS was a bank teller with Bank-1 from on or about December 14, 2015, to on or about March 21, 2016. As part of her duties as a bank teller, MILLS had access to customer account information, including account numbers, true names, and physical addresses.

5. On several occasions, MILLS used her position as a bank teller to access customer account information, often without a legitimate business justification. MILLS then kept the customer account information before passing it to conspirators, including Stanley Desirade.

6. Desirade would then provide the customer account information to other conspirators to create fraudulent identification documents. These fraudulent identification documents had the personally identifiable information of the accountholder, but with a picture of a coconspirator, such as Terrell Hale. Members of the conspiracy would then use these fraudulent identification documents to withdraw funds from the true accountholder's account.

7. When MILLS provided the customer account information to Desirade, she knew that it would be used to fraudulently withdraw money from the true accountholder's account.

8. Beyond providing customer account information to Desirade, MILLS participated in the conspiracy by (a) receiving fraudulent identification documents on Desirade's behalf; (b)

transporting Desirade to various bank branches in her car; and (c) calling Bank-1 and pretending to be a customer in furtherance of the conspiracy.

9. Additionally, between on or about April 26, 2016 and on or about May 6, 2016, MILLS and a coconspirator identified here as Individual-1 traveled to Texas and Louisiana to conduct fraudulent transactions on victim accounts. Specifically, Mills and Individual-1 went into banks, presented fraudulent identification documents in the names of victims, and withdrew money from the victims' accounts.

10. Throughout the course of the conspiracy, MILLS accessed the account information of at least 10 customers who later had money fraudulently withdrawn from the account. As a result, Bank-1 suffered a loss of at least \$210,700.

\* \* \*

### III. Conclusion


11. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case. MILLS acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offenses charged in this case.

12. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Jessica D. Aber  
United States Attorney

By:

  
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Christopher J. Hood  
Drew Bradylyons  
Assistant United States Attorneys

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Brianna Anthea Jordane Mills, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



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Brianna Anthea Jordane Mills  
Defendant

I am the defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.



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Dwight Crawley  
Counsel for Defendant